45 Terminal Loop, Suite 210
Walla Walla, WA 99362

July 30, 2018

Re: Comments to Petition For Rulemaking RM-11812 (Radwin, Ltd.)

Dear Commissioners and Other Interested Parties:

PocketiNet Communications, Inc. is a regional Wireless Internet Service Provider (WISP) in the Pacific Northwest. Our service territory encompasses urban, suburban and rural customers, all of whom need quality broadband internet for personal and/or business use. However, many of these customers live in areas where broadband service can only be delivered by fixed wireless internet at distances exceeding 5 miles from the nearest telecommunications tower. Adopting the Radwin Ltd. Petition for Rulemaking (RM-11812) is a critical step in extending broadband service to these rural customers.

The UNII-1 and U-NII-3 bands are already in widespread use in our market and nationwide to deliver broadband services to rural and remote customers, helping to close the digital divide – an FCC priority. However, the proliferation of traditional radio links in these bands with the resulting congestion and the dearth of alternative bands with the ability to deliver broadband data rates to remote customers is rapidly degrading the ability of WISPs to increase service levels and extend service to new customers.

The proposed rule changes would permit significantly more effective use of these bands – enabling higher power use while reducing congestion via more focused RF signaling – a unique win-win opportunity. Section II.D and Appendix B of the subject Petition detail the technical aspects of these benefits, which WISPs already apply in point-to-point scenarios. However, proliferating point-to-point links is neither cost effective nor practical because of the extreme impact on available spectrum and tower space. The Radwin petition seeks to leverage proven technology to achieve the same performance benefits in the point-to-multipoint configurations that are essential to the effective mass delivery of broadband internet.

The use of point-to-multipoint base stations with beam-forming and beam-steering antennas with higher power will enable them to transmit further, meaning that fewer base station transmitters will be required to be deployed, and more customers can be reached from existing sites. WISPs struggle to provide broadband service to these customers because doing so increasingly requires us to undertake the costs to install additional base station sites to support these remote customers.

As explained in section II.C of the subject Petition for Rulemaking, the technology that the new rules would promote is more spectrum efficient and will reduce potential spectrum congestion – it would limit the interference in the UNII-1 and U-NII-3 bands compared to legacy point-to-multipoint systems using wide beam sector antennas by directing transmissions to specific

remote subscriber locations. As pointed out in PFR Section II.B, the new rules would be patterned after those already applicable to another important unlicensed spectrum band -- the 2.4 GHz band (2400-2483.5 MHz). Applying such rules to the wider UNII-1 and UNII-3 bands will particularly benefit providers in rural areas who today may decide not to install additional base stations at high cost to reach a limited number of additional customers, when the installation costs are difficult to recover. The proposed rules will permit us to reach those same customers from existing locations, consistent with the FCC's goal of providing more robust broadband to remote areas.

In summary, I encourage the Commissioners to approve the Radwin Ltd. Petition for Rulemaking (RM-11812) in order to enhance the availability of broadband internet to customers throughout rural America where long-range fixed wireless service is the best medium for quality service delivery.

Sincerely,

Fred Facemire
Director of Engineer
PocketiNet Communications, Inc.